

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

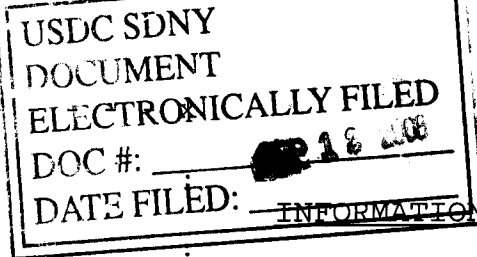
UNITED STATES OF AMERICA

- v. -

JENNIFER ROWE,

Defendant.

- - - - - x



S2 07 Cr. 771 (PAC)

COUNT ONE

The United States Attorney charges:

1. From in or about 2004, up to and including in or about December 2005, in the Southern District of New York and elsewhere, JENNIFER ROWE, the defendant, with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1546 of Title 18 of the United States Code.

2. It was a part and an object of the conspiracy that JENNIFER ROWE, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did forge, counterfeit, alter, and falsely make immigrant and non immigrant visas, permits, and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, and did utter, use, attempt to use, possess, obtain, accept, and receive such visas, permits, and other documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the

United States, knowing these documents to be forged, counterfeited, altered, and falsely made, and to have been procured by means of false claims and statements, and to have been otherwise procured by fraud and unlawfully obtained, and did make under oath, and as permitted under penalty of perjury under section 1746 of title 28, United States Code, subscribe as true, false statements with respect to material facts in applications, affidavits, and other documents required by the immigration laws and regulations, and knowingly presented such applications, affidavits, and other documents which contained such false statements and which failed to contain any reasonable basis in law and fact, in violation of Title 18, United States Code, Section 1546(a).

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, JENNIFER ROWE, the defendant, and others known and unknown, committed the following overt act, among others, in the Southern District of New York and elsewhere:

a. In or about November 2005, ROWE met with an individual and accepted payment in exchange for preparing the individual's Form I-687 and other immigration paperwork.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

4. From in or about 2004, up to and including in or about

December 2005, in the Southern District of New York and elsewhere, JENNIFER ROWE, the defendant, with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1341 of Title 18 of the United States Code.

5. It was a part and an object of the conspiracy that JENNIFER ROWE, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, would and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, such matter and thing, in violation of Title 18, United States Code, Section 1341.

Overt Acts

6. In furtherance of said conspiracy and to effect the illegal object thereof, JENNIFER ROWE, the defendant, and others

known and unknown, committed the following overt act, among others, in the Southern District of New York and elsewhere:

a. On or about August 18, 2005, ROWE caused a letter in connection with an application for immigration benefits to be sent via the United States Postal Service from Brooklyn, New York to Mount Vernon, New York.

(Title 18, United States Code, Section 371.)



MICHAEL J. GARCIA
United States Attorney

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Information

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(18 U.S.C. § 371)

MICHAEL J. GARCIA
United States Attorney.
